

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

KENNETH S. BANNING, JR.,  PLAINTIFF,  v.  ALIN AUGUSTIN MASCA AND MAHAI DORU POP,  DEFENDANTS.	C.A. NO. 08-00001 GMS  TRIAL BY JURY DEMANDED
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PLAINTIFF'S INTERROGATORIES DIRECTED TO  
DEFENDANT ALIN AUGUSTIN MASCA

AND NOW, comes the Plaintiff above named who does request Defendants answer the following Interrogatories under oath within (30) days . These interrogatories shall be deemed continuing so as to require further or additional answers up to the time of trial if additional and subsequent information is obtained by the Defendant(s).

1. Provide the state in which your current driver's license was issued, set forth your driver's license number, the date the license was issued as well as a description of any restrictions on said license.

ANSWER:

2. Identify every other state in which you currently possess or have possessed a driver's license over the past twenty (20) year time frame and for each set forth your driver's license number, the date said license was issued as well as a description of any restrictions on said licenses.

ANSWER:

3. State whether or not your driver's license has ever been suspended or revoked in any

state and if so, set forth the reason why it was suspended or revoked, state in which it was suspended or revoked, the date and length of the suspension and the date your license was reinstated.

ANSWER:

4. In your own words, describe how the accident, as averred in plaintiff's Complaint took place.

ANSWER:

5. State what part of your vehicle came into contact with the plaintiff.

ANSWER:

6. If you had not been involved in the accident which is the subject of this litigation, state where you were planning on going or in other words your next intended destination.

ANSWER:

7. During the ten year time period prior to the accident which is the subject of this litigation, have you ever been involved in any other accidents?

ANSWER:

8. If your response to the above is in the affirmative, provide a description of the accident providing the date and location of same as well as any citation that you may have received as a result of same, the name of any individuals involved in each said incident and whether or not any individuals including yourself made any claims for injury and/or damages as a result of said accident.

ANSWER:

9. During the ten year period prior to the accident which is subject to this litigation, have you ever been cited for any moving violation?

ANSWER:

10. If you responded affirmatively to the immediately preceding interrogatory, set forth the nature of the violation/citation, the date and time of same, the state wherein said violation or citation took place and whether or not you have ever been declared a habitual offender related to any moving violations or citations in any state or jurisdiction.

ANSWER:

11. At the time of the accident which is the subject of this litigation, state the identify of the owner of the vehicle to which you were operating that was involved in this collision and whether or not said vehicle was being provided by any sort of trip lease or other leasehold arrangement?

ANSWER:

12. Was the vehicle that you were operating at the time of the incident set forth in the Complaint repaired by any body shop or other collision repair specialist and if so set forth the name, address and phone number for the entity or person that made the repairs, describe the nature and extent of said repairs.

ANSWER:

13. Did you consume any alcoholic beverages during the 24 hour period of time before the accident which is the subject of this litigation and if so, describe the nature and amount of same.

ANSWER:

14. Did you consume or take any over the counter medication or prescription medication

during the 24 hour period of time before the accident which is the subject of this litigation and if so, set forth the name and amount of the medication and the time of day when said medication was ingested.

ANSWER:

15. Do you say or do know anybody else who will say that the plaintiff performed or omitted to perform any act which caused or contributed to the casualty herein complained of and if so, set forth each such act and/or such failure to act and identify by name, address and phone number each person with knowledge relative to said act or omission.

ANSWER:

ROBINSON GRAYSON DRYDEN  
& WARD

A handwritten signature in black ink, appearing to read 'Stephen F. Dryden', is written over a horizontal line.

STEPHEN F. DRYDEN, ESQUIRE

Bar I.D. No. 2157

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Attorney for Plaintiff

Dated: 3-10-08